

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATIE MILILLO, IRENE JOHNSON,
JANINE HELLER and TOMAYITA
STEVENSON,

Plaintiffs,

vs.

WHITMAN EDUCATION GROUP,
INC., CAREER EDUCATION
CORPORATION, ULTRASOUND
DIAGNOSTIC SCHOOL and LOUIS
GIANELLI,

Defendants.

CASE NUMBER: 04-30130-MAP

PLAINTIFF'S MOTION TO QUASH AND FOR A PROTECTIVE ORDER¹

I. INTRODUCTION

This is an action for equitable relief and compensatory and punitive damages brought by the plaintiffs.

All of Ms. Milillo's claims against the defendants relate to actions and omissions of the defendants which occurred **prior to her leaving their employment** in September, 2003.

The corporate defendants have served deposition subpoenas on Porter and Chester Institute, Premier Education Group and Northeast Dental Associates. Plaintiff Milillo seeks a protective order pursuant to Fed.R.Civ.P. 26(c) in which she seeks an order quashing the deposition subpoenas served by

¹ The defendant also served a subpoena on Wing Memorial Hospital seeking plaintiff Johnson's subsequent employment records. The plaintiffs oppose production of such information but understand that Wing has already sent the defendant the documents.

the corporate defendants upon her subsequent employers, or limiting disclosures at any such deposition to information related to the financial compensation and other employee benefits provided to Ms. Milillo during the course of her employment with her subsequent employers.

Respectfully submitted,

PLAINTIFF
By her Attorney,

Dated: October 31, 2005

/s/Suzanne Garrow
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served upon the attorney of record for each other party by electronic mail on this date.

/s/ Suzanne Garrow
Suzanne Garrow